DEORCHIS & PARTNERS, LLP 2355 Main Street South Chatham, MA 02659 (508) 432-2121

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

DANZAS CORPORATION d/b/a DHL DANZAS AIR & OCEAN,

Plaintiff,

- against -

KROFTA TECHNOLOGIES CORPORATION, PETER R. KIRCHNER, MICHAEL NOYES, NORTHEAST FABRICATORS & MECHANICAL SERVICES, LLC, and DANIEL SHEPARD,

Defendants.

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FILING FEE PAID:

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Civil Case no.: ____

04-30219-MAP

MOTION FOR PRO HAC VICE ADMISSION OF ATTORNEY JOHN K. FULWEILER, JR.

Plaintiff, DANZAS CORPORATION d/b/a DHL DANZAS AIR & OCEAN ("DHL"), through its undersigned local counsel, moves that leave be granted for Attorney John K. Fulweiler, Jr. to appear and practice in this Court in this particular case.

Filed in support of this motion are the (1) <u>Certificate of John K. Fulweiler, Jr. In Support of Pro Hac Vice Admission</u>, dated November 5, 2003; and (2) a check made payable to the "Clerk, U.S. District Court" in the amount of \$50.00. Further, undersigned counsel has known Mr. Fulweiler for approximately five (5) years and knows him to have an excellent reputation among the admiralty bar.

This motion is being filed concurrently with the commencement of the plaintiff's lawsuit and, as such, no parties have yet appeared in this matter.

RESPECTFULLY SUBMITTED this _____ day of November, 2004.

DEORCHIS & PARTNERS, LLP Attorney for Plaintiff DANZAS CORPORATION d/b/a DHL DANZAS AIR & OCEAN

By:

David V Farrell, Esq. BBO # 559847

2355 Main Street

P.O. Box 186 S. Chatham, MA 02659

(508) 432-2121

Certificate of Service

I certify that no parties have appeared in this matter such that service of this pleading is not required.

David J. Farrell Jr.